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April 2, 2025
Via ECF

The Hon. James Donato
United States District Court
for the Northern District of California
450 Golden Gate Avenue
Courtroom 11, 19th Floor
San Francisco, CA 94102

Re: *Klein, et al. v. Meta Platforms, Inc.*, No. 3:20-cv-08570-JD

Your Honor:

I write on behalf of Advertiser Plaintiffs to respectfully request scheduling of a concurrent expert proceeding at which the Court can hear from Dr. Michael Williams about his opinions in this case. A concurrent expert proceeding had previously been scheduled on four separate occasions, but was taken off calendar as the Court set a new class certification briefing schedule as discussed below. *See* Dkts. 289, 379, 708, and 730.

On April 18, 2024, the Court terminated without prejudice “all pending class certification and expert witness motions” and set a schedule for renewed class certification and class expert motions. Dkt. 789. On May 24, 2024, Advertiser Plaintiffs timely filed a renewed motion for class certification, supported by the expert opinions of Dr. Michael Williams. Dkt. 796. That same day, Meta moved to exclude Dr. Williams’s class certification opinions. Dkt. 800.

Yesterday (April 1, 2025), the Court issued an order administratively terminating Advertiser Plaintiffs’ class certification motion pending resolution of Meta’s motion to exclude Dr. Williams, noting the “admissibility of advertiser plaintiffs’ expert’s opinions may be dispositive of the request to certify a class.” Dkt. 917. Given the content of Meta’s motion to exclude Dr. Williams and the Court’s

April 2, 2025

Page 2

general practices, Advertiser Plaintiffs respectfully submit that the Court may wish to hear directly from Dr. Williams about his opinions in this case at a concurrent expert proceeding. To the extent the Court wishes to hold such a proceeding, Advertiser Plaintiffs and Dr. Williams are available at the Court's convenience.

Respectfully submitted,



Yavar Bathaei